

Exhibit 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW J. MAXWELL, not individually,)	
but as Trustee for the estate of Eduardo Garcia)	Case No. 1:20-cv-02402
and Julia Escamilla (nka Julia Garcia), et al.,)	
)	Judge Rebecca R. Pallmeyer
Plaintiffs,)	
vs.)	Judge Heather K. McShain
)	
WELLS FARGO BANK, N.A.,)	
)	
Defendant.)	

**DECLARATION OF ANGELA A. SMEDLEY IN SUPPORT OF DEFENDANT’S
MOTION TO EXTEND DISCOVERY DEADLINES**

I, Angela A. Smedley, hereby declare as follows:

1. I am an attorney licensed to practice in the State of New York, have been admitted *pro hac vice* in the State of Illinois, and am a partner with Winston & Strawn LLP, counsel for Wells Fargo Bank, N.A. (“Defendant”) in the above-captioned matter.

2. On June 23, 2021, I requested a 30-day extension for Wells Fargo to respond to Plaintiff’s written discovery requests. Counsel for Plaintiff did not consent to a 30-day extension of the discovery deadlines. On June 24, 2021, I reduced the request for an extension from 30 days to 21 days, and, later that day, counsel for Plaintiff refused to agree to a 21-day extension of the discovery deadlines.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.

Dated: June 30, 2021

/s/ Angela A. Smedley
Angela A. Smedley

Certificate of Service

The undersigned, an attorney, hereby certifies that on the 30th day of June, 2021, the foregoing Declaration of Angela A. Smedley in Support of Defendant's Motion to Extend Discovery Deadlines was filed electronically with the Clerk of the Court for the United States District Court for the Northern District of Illinois, and was served by operation of that Court's electronic filing system on all parties of record.

Dated: June 30, 2021

/s/ Angela A. Smedley
Angela A. Smedley